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*Attorney for Defendants*  
*Jiangtian Sun and Sun Timepiece Trade, LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DEV ANANTH DURAI,

**Plaintiff,**

V.

JIANGTIAN SUN, individually, and SUN  
TIMEPIECE TRADE, LLC, a Nevada  
Limited Liability Company; DOES 1 through  
10, inclusive; DOES & ROES  
CORPORATIONS ENTITIES 1 through 10  
inclusive;

### Defendants.

Case No. 2:19-cv-00670-APG-GWF

**STIPULATION AND ORDER  
EXTENDING TIME FOR PLAINTIFF TO  
REPLY TO SPECIALLY APPEARING  
DEFENDANTS JIANGTIAN SUN AND  
SUN TIMEPIECE TRADE, LLC  
MOTION TO DISMISS**

**(PLAINTIFF'S FIRST REQUEST)**

Plaintiff Dev Ananth Durai (“Plaintiff”) and Specially Appearing Defendants Jiangtian Sun and Sun Timepiece Trade, LLC (“Specially Appearing Defendants”) by and through their respective counsel of record, hereby stipulate and agree, with the Court’s approval, as follows:

## RECITALS

WHEREAS, Plaintiff filed a complaint in this action initiating Case No. 2:19-cv-00670-APG-GWF on April 18, 2019 (*See* ECF No. 1.);

WHEREAS, Plaintiff filed an amended complaint in this action on April 23, 2019 (See ECF No. 5.);

WHEREAS, Specially Appearing Defendants' filed a Motion to Dismiss Complaint on May 23, 2019 (Doc. 14), pursuant to stipulation and order to extend time for Defendants' to file

1 said responsive pleading (Doc. 13).

2 WHEREAS, Plaintiff's Reply in Opposition to Motion to Dismiss is due on June 6, 2019;

3 WHEREAS, Specially Appearing Defendants and Plaintiff agree to allow Plaintiff by this  
4 stipulation and order up through June 19, 2019;

5 This is Plaintiff's first request for an extension of time to respond to Specially Appearing  
6 Defendants' responsive pleading; this request from Plaintiff is not made for any improper purpose  
7 or for the purpose of delay or bad faith; Plaintiff is requesting the extension due to unavailability  
8 of Plaintiff's Counsel from May 28, 2019 to June 19, 2019 for a previously scheduled overseas  
9 trip.

10 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through  
11 their counsel, as follows:

12 Plaintiff shall file his response to Defendants' Motion to Dismiss by or on June 19, 2019.

13 **SO STIPULATED.**

15 DATED: June 3, 2019

**The Thater Law Group, P.C.**

16 By: /s/ M. Lani Esteban-Trinidad  
17 M. LANI ESTEBAN-TRINIDAD  
18 *Attorney for Plaintiff*  
Dev Ananth Durai

19 DATED: June 3, 2019

**Enenstein Pham & Glass**

20 By: /s/ Robert A. Rabbat  
21 ROBERT A. RABBAT, ESQ.  
22 *Attorney for Specially Appearing Defendants*  
23 Jiangtian Sun a/k/a John Sun d/b/a as  
Sun Timepiece Trade, LLC

25 **IT IS SO ORDERED:**

27 Dated: June 4, 2019.



28 UNITED STATES DISTRICT JUDGE